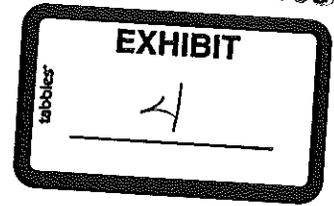


May 29, 2009

JUN 08 2009



Commissioner Jerry Farrell, Jr.  
Department of Consumer Protection  
State of Connecticut  
Hartford, Connecticut

RE: Geoexchange Informational Session, June 8, 2009

Dear Commissioner Farrell:

The National Ground Water Association (NGWA) is a not-for-profit professional society and trade association for the ground water industry. Our 13,000 members from all 50 states include some of the country's leading public and private sector ground water scientists, engineers, water well contractors, manufacturers, and suppliers of ground water related products and services.

The Association's mission is to advance the expertise of ground water professionals and work to further ground water awareness and protection through education and outreach.

As you are aware, an estimated 1.02 million Connecticut residents use ground water for their drinking water source. In addition, ground water provides much of the water used for irrigation in the state, and a significant supply for industry. NGWA believes it is critical that ground water be protected for existing or potential beneficial uses.

The Association commends the State's Geoexchange Work Group for their efforts to gather additional information in advance of regulatory action regarding direct exchange or DX geothermal systems operations and their potential to impact ground water. In response to the work group's specific request regarding permitting and licensing issues, NGWA offers the following:

The Association has long supported the adoption and proper enforcement of state water well drilling programs in order to assure:

- Increased protection for the homeowner who uses ground water as a drinking water source
- A public that has confidence in the contractor as a licensed professional
- The protection of the ground water resource through adherence to proper water well construction standards
- A minimum level of competence among water well contractors.

While the Association's position on state drilling programs (copy attached) is aimed at water well drilling, it is offered as potentially instructive as the state reviews the installation of DX systems that penetrate the subsurface and have the potential for introducing a pathway to contamination.

Thank you for the opportunity to share our perspectives for the benefit of ground water protection. If you have any questions, please do not hesitate to contact Christine Reimer, 800.551.7379, ext. 560, of my staff.

Sincerely,

Kevin B. McCray, CAE  
Executive Director

C: NGWA Board of Directors  
Connecticut Water Well Association President and Executive Secretary



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# ISSUE BRIEF

- Title:** Water Well Contractor Licensing
- Subjects:** Water well contractor licensing/ground water use/ground water protection
- Audience:** Homeowners/governmental officials/building contractors
- Background:** Fifty-three percent of the U.S. population uses ground water for their drinking water source. Approximately 95 percent of rural residents depend entirely on this resource for their domestic uses. Census figures indicate that during 1990 there were 15,123,730 households served by private water wells. The federal Safe Drinking Water Act's provisions, which are intended to protect public drinking water, do not extend to private household wells.
- As a means of protecting the public, 47 states have instituted statewide programs to license individuals installing wells. Although specific requirements for these programs vary from state to state, generally some combination of testing, years of experience or some other criteria are used to measure the competence and knowledge of the contractor regarding water well construction techniques. These laws also provide the states with an enforcement tool to assure compliance with applicable construction codes.
- Issue:** Should states license water well contractors to help ensure that homeowners are provided with a safe drinking water supply and the ground water resource is protected?
- Position:** There is nothing more basic to human survival than provision for an adequate water supply. The National Ground Water Association (NGWA) endorses the administration of a fair and equitable licensing program that is properly enforced in order to assure:
- Increased protection for the homeowner who uses ground water as a drinking water source

- A public that has confidence in the contractor as a licensed professional
- The protection of the ground water resource through adherence to proper water well construction standards
- A minimum level of competence among water well contractors.

NGWA encourages states that have no water well contractor licensing to investigate the public health and environmental benefits of instituting such a program. Further, NGWA encourages states with licensing programs to adopt the tests administered in the Association's voluntary certification program as part of their state requirements. The use of a national test provides a method of assuring a minimum level of competence throughout the industry, a standard of protection for the resource, equitable treatment for homeowners, and a pathway to reciprocity. Currently, 16 states have incorporated these tests in their licensing procedure.

In order to maintain the level of competence, as demonstrated by the successful completion of the initial license test and to assure that advances in technology and science are applied in the field, NGWA also endorses the concept of proof of continuing education as prerequisite to license renewal.

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**Reference:** National Water Well Association, *United States Water Well Marketplace* p. B7, 1986.

U.S. Environmental Protection Agency, *Ground Water Protection Strategy*, p. 11, 1984.

U.S. Environmental Protection Agency, *Manual of Water Well Construction Practices*, 1977.

**Date:** Adopted by the National Ground Water Association Board of Directors April 22, 1988. NGWA issue briefs are updated as needed to reflect changes in information. Technical amendments August 7, 1991. Technical amendments February 4, 1992. Technical amendments July 14, 1997. Technical amendments October 13, 1998. Formatting changes February 1996. Technical amendments February 5, 1999. Technical amendments August 3, 1999. Technical changes July 19, 2005. Technical change September 13, 2005.